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*Attorneys for Defendants  
United Healthcare Services, Inc., and  
UnitedHealth Group Incorporated*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

Reyna Dempsey, individually, on behalf of  
others similarly situated, and on behalf of the  
general public,

Plaintiff,

v.

Government Employees Insurance Company,  
United Healthcare Services, Inc., UnitedHealth  
Group Incorporated, and DOES 1 through 10,  
inclusive,

Defendants.

Case No. 5:24-cv-00425-EJD

ASSIGNED TO THE HON. EDWARD J.  
DAVILA

**JOINT STIPULATION TO EXTEND  
TIME TO RESPOND TO COMPLAINT  
[LOCAL RULE 6-1]**

1 Plaintiff Reyna Dempsey, individually, on behalf of others similarly situated, and on behalf of  
2 the general public ("Plaintiff") and Defendants United Healthcare Services, Inc. ("UHC") and  
3 UnitedHealth Group Incorporated ("UHG") (together, the "United Defendants"), by and through their  
4 respective counsel, hereby agree and stipulate as follows:

5 WHEREAS, Plaintiff filed the Complaint in this Court on January 24, 2024;

6 WHEREAS, on February 2, 2024, Plaintiff served Defendant UHC with the Complaint;

7 WHEREAS, on February 14, 2024, Defendant UHG accepted service of the Complaint via  
8 email;

9 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendant UHC's deadline to file  
10 a responsive pleading to Plaintiff's Complaint is February 23, 2024;

11 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendant UHG's deadline to  
12 file a responsive pleading to Plaintiff's Complaint is March 6, 2024;

13 WHEREAS, the United Defendants are represented by the same counsel;

14 WHEREAS, counsel for Plaintiff and the United Defendants have conferred, and the parties  
15 agree that the deadline for the United Defendants to answer or otherwise respond to the Complaint be  
16 extended to March 25, 2024;

17 WHEREAS, the parties will benefit from this extension of time, as it will enable the parties to  
18 investigate and meet and confer regarding Plaintiff's allegations;

19 WHEREAS, this extension of time will not affect any other deadlines on the Court's calendar;

20 NOW, THEREFORE, pursuant to Local Rule 6-1 of the Northern District of California, it is  
21 hereby stipulated and agreed, that the United Defendants shall have until March 25, 2024 to file their  
22 response to Plaintiff's Complaint.

23 **IT IS SO STIPULATED.**

1 DATED: February 22, 2024

Respectfully submitted,

2 GIBSON, DUNN & CRUTCHER LLP

3 By: /s/ Heather L. Richardson

4 Heather L. Richardson

5 Attorneys for Defendants  
6 United Healthcare Services, Inc. and  
UnitedHealth Group Incorporated

7 DATED: February 22, 2024

NICHOLS KASTER, LLP

9 By: /s/ Matthew Helland

10 Matthew Helland

11 Attorneys for Plaintiff Reyna Dempsey

1 **ATTORNEY ATTESTATION**

2 Pursuant to Civil Local Rule 5-1(i)(3), I, Heather Richardson, hereby attest that concurrence  
3 in the filing of this document has been obtained from Plaintiff's counsel Matthew Helland.

4 DATED: February 22, 2024

Respectfully submitted,

5 GIBSON, DUNN & CRUTCHER LLP

6  
7 By: /s/ Heather L. Richardson  
Heather L. Richardson

8 Attorneys for Defendants  
9 United Healthcare Services, Inc. and  
10 UnitedHealth Group Incorporated  
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